

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

CHARLENE CARTER,

Plaintiff,

v.

SOUTHWEST AIRLINES CO., AND
TRANSPORT WORKERS UNION
OF AMERICA LOCAL 556,

Defendants.

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Civil Action No. 03:17-cv-02278-S

**DEFENDANTS' JOINT MOTION TO STRIKE / MOTION FOR
MORE DEFINITE STATEMENT PURSUANT TO FRCP 12(e) AND 12(f)**

Defendants Southwest Airlines Co. ("Southwest") and Transport Workers Union of America, Local 556 ("TWU") bring this Motion to Strike / Motion for More Definite Statement pursuant to Federal Rules of Civil Procedure 12(e) and 12(f) on the grounds set forth herein and in the documents filed in support.

GROUND FOR MOTION

1. The Court should strike the Third Amended Complaint because it contains redundant, immaterial, impertinent, or scandalous material. Such material includes, but is not limited to, causes of action (and allegations in support thereof) that this Court has dismissed with prejudice.

2. The Court should strike the Third Amended Complaint because it is sufficiently vague or ambiguous that defendants cannot reasonably prepare an appropriate response.

Respectfully submitted,

/s/ Brian K. Morris

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**COUNSEL FOR DEFENDANT
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OF AMERICA LOCAL 556**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been served upon counsel of record via the U.S. District Court, Northern District's CM/ECF system on this the 15th day of March, 2019.

/s/ *Brian K. Morris*

Brian K. Morris